

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate of Bernard  
L. Madoff,

Plaintiff,

v.

SONJA KOHN, et al.,

Defendants.

SIPA LIQUIDATION

No. 08-01789 (SMB)

(Substantively Consolidated)

Adv. Pro. No. 10-05411 (SMB)

**STIPULATION AND ORDER EXTENDING TIME TO RESPOND**

IT IS HEREBY STIPULATED AND AGREED, by and between the plaintiff Irving H. Picard, Trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff (the “Trustee”), and defendants Sonja Kohn, Infovaleur, Inc. and Tecno Development & Research, Ltd. (the “Defendants”), by and through their undersigned counsel, that the time by which the Defendants may respond to the Motion for Leave to File a Third Amended Complaint (the “Motion to Amend”) filed by the Trustee is extended up to and including March 1, 2019. It is further stipulated and agreed that the Trustee shall file his reply on or before March 22, 2019. The return date for this matter is set for April 24, 2019, at 10:00 a.m.

IT IS FURTHER STIPULATED AND AGREED, by and between the Trustee and the Defendants, by and through their undersigned counsel, that the time by which the Defendants may answer, move, or otherwise respond to the Trustee’s complaint (the “Complaint”) is extended up to and including March 1, 2019. Nothing in this Stipulation is a waiver of the Defendants’ right to request from the Court a further extension of time to answer, move, or otherwise respond, and/or the Trustee’s right to object to such request.

The purpose of this stipulated extension (the “Stipulation”) is to provide additional time for the Defendants to respond to the Motion to Amend and the Complaint. The extension of time granted by this Stipulation is without prejudice to any future extensions of time.

Undersigned counsel for the Defendants represents that service of process of the summons and Complaint on the Defendants has been completed, and hereby waives any defenses based on insufficiency of process or insufficiency of service of process on behalf of the Defendants.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same

instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: October 22, 2018  
New York, New York

**BAKER & HOSTETLER LLP**

By: /s/ Keith R. Murphy

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*Attorneys for Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate  
of Bernard L. Madoff*

**NEUBERGER, QUINN, GIELEN, RUBIN & GIBBER,  
P.A.**

By: /s/ Nathan D. Adler

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*Attorneys for Defendants Sonja Kohn,  
Infovaleur, Inc. and Tecno Development &  
Research Ltd.*

SO ORDERED this 23<sup>rd</sup> day of October, 2018.

/s/ STUART M. BERNSTEIN

HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE